

# **EXHIBIT A**



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January 15, 2025

**VIA E-MAIL & USPS**

Joseph Alter, Esq.  
The Anthony Pope Law Firm  
60 Park Place, Suite 703  
Newark, New Jersey 07102

Dear Joe:

Winne Banta Basralian & Kahn, PC is presently acting as defense counsel for Daniel Dadoun and various affiliated entities, who are defendants in the civil litigation matters listed in Schedule A of this letter. We have invited Daniel Dadoun to visit our offices in Hackensack, New Jersey on Tuesdays and Thursdays from 10:00 AM until 3:00 PM for the next 180 days in order for Daniel Dadoun to aid in his defense.

We understand that you will be requesting a bail modification to accommodate this arrangement shortly. Please share this letter with the appropriate persons.

Sincerely,

Richard D. Wolloch

RDW:amm

**SCHEDULE A**

1. Guthrie v. Township of Pemberton Planning Board and Pemberton-2, LLC (BUR-L-42-24 and App. Div. A-000627-24)
2. ARCO Design/Build Industrial LLC v. 200 South Pemberton Urban Renewal, LLC and U.S. Specialty Ins. Co. (BUR-L-2336-23)
3. Returns 360 LLC d/b/a Returns Worldwide v. 200 South Pemberton Urban Renewal, LLC and 200 South Pemberton Operations, LLC (formerly BUR-C-23-24; now BUR-L-2066-24)
4. Cintas v. 200 South Pemberton Urban Renewal, LLC (claim/arbitration pending in negotiation; no lawsuit filed yet)
5. Burton Trent Public Affairs, LLC v. Pemberton 2 LLC and DD Development LLC (BUR-DC-12936-24)